

# **EXHIBIT D**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

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PIERRE BRAZEAU, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI  
BARBIER, ERIC J. SCHOEN, JAMES W.  
KUPIEC, NADAV FRIEDMANN and  
MICHAEL MARSMAN,

Defendants.

Case No. 1:21-cv-00751-RP

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WANDA NEWELL, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI  
BARBIER, and ERIC J. SCHOEN,

Defendants.

Case No. 1:21-cv-00760-RP

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KATLYN K. REIN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI  
BARBIER, ERIC J. SCHOEN, JAMES W.  
KUPIEC, NADAV FRIEDMANN and  
MICHAEL MARSMAN,

Defendants.

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Case No. 1:21-cv-00856-RP

**JOINT DECLARATION IN SUPPORT OF THE MOTION OF THI HUYEN VU, QING YANG, RONALD L. SELMAN, AND VINOD THUKRAL FOR CONSOLIDATION OF THE ACTIONS, APPOINTMENT AS LEAD PLAINTIFFS, AND APPROVAL OF SELECTION OF COUNSEL**

We, the undersigned, pursuant to 28 U.S.C. § 1746, declare as follows:

1. We, Thi Huyen Vu, Qing Yang, Ronald L. Selman, and Vinod Thukral (“Movants”), respectfully submit this Joint Declaration in support of our Motion for Consolidation of the above-captioned actions (the “Actions”), Appointment as Lead Plaintiffs, and Approval of Selection of Counsel (the “Joint Declaration”). We each have personal knowledge about the information contained in this Joint Declaration as to ourselves.

2. We are all informed of and understand the requirements of serving as lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”). We understand that each of us could have chosen to pursue individual actions, individual motions for appointment as lead plaintiff, or taken no action and remained absent class members. However, we have decided to move for lead plaintiff in this case jointly because we believe combining our collective resources and knowledge will best serve the Class.<sup>1</sup>

3. I, Thi Huyen Vu, as reflected in my Certification, purchased Cassava securities during the Class Period and suffered a substantial loss as a result of the violations of the federal securities laws alleged in the Actions. I am motivated to recover this loss for my own benefit and the benefit of all members of the Class. I currently reside in Maribyrnong, Victoria, Australia and possess a high school diploma. I am currently self-employed as a developer for my company, 398 Barkly Street Pty Ltd., which I started approximately 6 years ago. I also have experience in hiring and overseeing attorneys for real estate matters. I consider myself to be a sophisticated investor

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<sup>1</sup> The “Class” consists of all purchasers of Cassava Sciences, Inc. (“Cassava” or the “Company”) common stock between September 14, 2020 and August 27, 2021, inclusive (the “Class Period”).

and have been investing for over one year. I decided to seek appointment as lead plaintiff with Qing Yang, Ronald L. Selman, and Vinod Thukral after learning of their motivation to recover on behalf of investors and that we were each in discussions with our counsel to pursue claims on behalf of the Class.

4. I, Qing Yang, as reflected in my Certification, purchased Cassava securities during the Class Period and suffered a substantial loss as a result of the violations of the federal securities laws alleged in the Actions. I am motivated to recover this loss for my own benefit and the benefit of all members of the Class. I currently reside in San Rafael, California and completed several college courses. I am currently retired, but prior to that, I worked as office assistant in a local county office. I consider myself to be a sophisticated investor and have been investing for 20 years. I decided to seek appointment as lead plaintiff with Thi Huyen Vu, Ronald L. Selman, and Vinod Thukral after learning of their motivation to recover on behalf of investors and that we were each in discussions with our counsel to pursue claims on behalf of the Class.

5. I, Ronald L. Selman, as reflected in my Certification, purchased Cassava common stock during the Class Period and suffered a substantial loss as a result of the violations of the federal securities laws alleged in the Actions. I am motivated to recover this loss for my own benefit and the benefit of all members of the Class. I currently reside in Elkton, Florida. I possess an Associate of Arts in Liberal Arts (AALA) from Cabrillo College in Aptos, California, along with additional credits from De Anza College in Cupertino, California. I am currently retired, but prior to that, I was a Light Rail Substation Maintainer with Santa Clara Valley Transportation Authority (SCVTA) in San Jose, California. I also have experience in hiring and overseeing attorneys for construction related matters. I consider myself to be a sophisticated investor and have been investing for over 12 years. I decided to seek appointment as lead plaintiff with Thi Huyen

Vu, Qing Yang, and Vinod Thukral after learning of their motivation to recover on behalf of investors and that we were each in discussions with our counsel to pursue claims on behalf of the Class.

6. I, Vinod Thukral, as reflected in my Certification, purchased Cassava securities during the Class Period and suffered a substantial loss as a result of the violations of the federal securities laws alleged in the Actions. I am motivated to recover this loss for my own benefit and the benefit of all members of the Class. I currently reside in Brooklyn, New York. I possess a medical degree in internal medicine. I am currently employed at Advantage Care Physicians as an Internal Medicine Physician in Urgent Care. I consider myself to be a sophisticated investor and have been investing for approximately 20 years. I decided to seek appointment as lead plaintiff with Thi Huyen Vu, Qing Yang, and Ronald L. Selman after learning of their motivation to recover on behalf of investors and that we were each in discussions with our counsel to pursue claims on behalf of the Class.

7. We, Thi Huyen Vu, Qing Yang, Ronald L. Selman, and Vinod Thukral, believe that the allegations against Cassava are meritorious and that the Class will benefit from having highly motivated investors with substantial financial interests at stake like ourselves to control the class action. We believe that our combined efforts, knowledge, and diverse background will better serve the Class. If appointed lead plaintiffs, our primary goal will be to ensure that the Class achieves the largest possible recovery.

8. On August 27, 2021, Pierre Brazeau filed a putative class action in this District, Case No. 1:21-cv-00751-RP (the “*Brazeau Action*”), on behalf of all purchasers of Cassava common stock during the Class Period. The action seeks relief against Cassava and certain of its senior officers for violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934

and Rule 10b-5 promulgated thereunder by the U.S. Securities and Exchange Commission.

9. On August 30, 2021, Wanda Newell commenced a nearly identical action in this District on behalf of all purchasers of Cassava securities during the Class Period, asserting the same claims against the same defendants as the *Brazeau* Action, Case No. 1:21-cv-00760-RP (the “*Newell* Action”). Finally, a third action was commenced by Katlyn K. Rein on September 24, 2021 in this District on behalf of the same Class, asserting the same claims against the same defendants as the *Brazeau* Action, Case No. 1:21-cv-00760-RP (the “*Rein* Action”).

10. We are like-minded investors who contacted and retained Levi & Korsinsky, LLP (“Levi & Korsinsky”) to represent us in the Actions as Lead Counsel. After discussing the allegations against Cassava, the procedural background of the Actions, the process of appointing a lead plaintiff in cases such as this, and attorneys’ fees, we learned of each other’s existence and similar willingness to litigate the claims of the Class.

11. Upon learning of each other’s interest seeking appointment of lead plaintiff in this matter through our counsel, we communicated with one another and our counsel on Monday, October 25, 2021, at approximately 4:30 PM EST, where we discussed among other things: the allegations and the strength of the claims against defendants; a strategy for prosecuting the Actions; the role of the lead plaintiff and the lead plaintiff selection and litigation process; the benefits that the class would receive from the leadership of four like-minded investors like us; a shared desire to achieve the best possible result for the class; our interests in prosecuting the case in a collaborative, likeminded manner; attorney’s fees, and the actions that we will take to continue to ensure that the claims will be zealously and efficiently litigated.

12. We believe that the Class will benefit from having four highly motivated investors with substantial financial interests at stake as lead plaintiffs. We feel that our combined efforts and

knowledge will better represent the Class as a whole, which is likely made up of the same composition. We all decided to work together in order to collaborate and exercise joint decision-making. We agree to work collaboratively to represent all Cassava shareholders who suffered damages during the Class Period and to ensure that the Class achieves the largest recovery possible.

13. We each understand that, if appointed, we would owe a fiduciary duty to the Class to provide effective representation and to ensure that Lead Counsel effectively litigates the Actions. All of us understand that if we are appointed as lead plaintiffs, we will owe a duty to the putative Class to provide fair and adequate representation, oversee counsel, and obtain the largest possible recovery against all culpable parties consistent with good faith and vigorous advocacy. All of us will do our best to maximize the recovery for the Class.

14. If appointed as lead plaintiffs, we agree to actively manage the prosecution of the Actions including reviewing documents, having joint calls, discussing through email any developments, participating in discovery, and exercising joint decision-making to execute a strategy to maximize the recovery of the entire Class. We are confident in our ability to reach joint decisions regarding litigation matters and will use consensus decision making to maximize the recovery for the Class. We agree that we will share our perspectives, experiences, and resources and will remain actively involved to ensure the Class is afforded the highest degree of representation.

15. Given our obligations to the Class and our shared common interest in maximizing the recovery for all investors, we fully expect to reach a consensus regarding litigation decisions. However, in the unlikely event that a disagreement arises, we agree to a simple majority vote. In the event of a deadlock, each group member would have voting power respective to their claimed loss.

16. We select Levi & Korsinsky to serve as Lead Counsel on behalf of the Class and believe Levi & Korsinsky has the experience and ability to effectively and expeditiously bring the Actions to a close and achieve a strong recovery on behalf of the Class. We are familiar with the experience, resources, and successes of our proposed Lead Counsel, Levi & Korsinsky. We are well aware that Levi & Korsinsky is an accomplished law firm with a history of achieving significant settlements and corporate governance reforms with defendants. Indeed, we believe that the firm's prior experience of effectively litigating complex class action lawsuits will provide comfort that the proposed Class will receive the best possible representation. We also believe that Levi & Korsinsky will vigorously prosecute the Actions in a cost-effective manner and in the best interests of all members of the putative Class.

17. It is our goal to resolve the Actions in an expeditious manner that is fair to all members of the Class. Through supervision of our chosen counsel, Levi & Korsinsky, we will ensure that the Actions are prosecuted for the benefit of the Class in an efficient and effective manner. In that regard, we will direct Levi & Korsinsky to prosecute the Actions in such a way to achieve a fair result for all members of the Class. We have implemented communication procedures to ensure that we can quickly communicate and make decisions on short notice. We understand that we may call for a meeting or conference call at any time, including on an emergency basis if necessary. We understand that meetings, conference calls, and communications may be conducted without counsel. We agree to contact one another when necessary to facilitate the best interests of the Class and to prosecute the Actions. We do not foresee any problems communicating with one another or staying abreast of the progress of the litigation.

18. We have also directed counsel to keep us informed of any developments in the Actions—including any developments in the lead plaintiff proceedings. To this end, we will




continue to direct Lead Counsel and oversee the prosecution of the Actions for the benefit of the Class by reviewing pleadings, orders, and motion papers and conferring amongst ourselves. Further, we agreed that we will make ourselves available to personally travel for any appearances, depositions, settlement hearings, and other necessary meetings to facilitate the prosecution of the Actions.

16. We, Thi Huyen Vu, Qing Yang, Ronald L. Selman, and Vinod Thukral, hereby reaffirm our commitment to satisfying the fiduciary duties that we will owe to the Class if appointed as Lead Plaintiffs, including conferring with counsel regarding litigation strategy, attending court proceedings and depositions, if necessary, and reviewing documents, pleadings, and motions in the Actions. Our main goal is obtaining the largest recovery possible for the Class.

I, Thi Huyen Vu, declare, pursuant to 28 U.S.C. § 1746, under the penalty of perjury that the foregoing is true and correct.

Executed this 26th day of October, 2021.

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Thi Huyen Vu

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I, Qing Yang, declare, pursuant to 28 U.S.C. § 1746, under the penalty of perjury that the foregoing is true and correct.

Executed this 26th day of October, 2021.

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*Qing Yang*  
DocuSigned By: Qing Yang

Qing Yang

I, Ronald L. Selman, declare, pursuant to 28 U.S.C. § 1746, under the penalty of perjury that the foregoing is true and correct.

Executed this 26th day of October, 2021.

DocuSigned by:

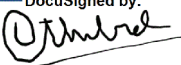
**Ronald L. Selman**

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Ronald L. Selman

I, Vinod K. Thukral, declare, pursuant to 28 U.S.C. § 1746, under the penalty of perjury that the foregoing is true and correct.

Executed this 26th day of October, 2021.

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Vinod K. Thukral